	1	Case 1:05-cv-00031	Document 4	Filed 10/27/2005	Page 1 of A	
					Dismot Corat	
	1	Law Office of G. Anthony Long			001 2 7 2005	
	2	P. O. Box 504970 Second Floor Lim's Bldg. San Jose, Saipan, MP 96950 Telephone No. (670) 235-4802 Facsimile No. (670) 235-4801			For The Northern Mariana Islands	
	3				(Deputy Closis)	
	4					
	5					
	6	Attorney for Defendant	Dong Guk			
	7	TAT COVER		A TELE DIGERRA	n cover	
	8	IN THE UNITED STATES DISTRICT COURT FOR THE				
	9	NORTHERN MARIANA ISLANDS				
	10					
4801	11	JUNG SOON LEE, (De	′) CIVIL ACT	ION NO. 05-0031	
Anthony Long loo Lim's Building n, MP 96950 Fax No: (670) 235-4801	12	By SUNG YOUNG LE Representative	E, Personal)		
	13	Plaint	iff	<i>)</i>)		
ANTI Floor L an, MP Fax N	14	V.) DEFENDAN	T'S RULE 26 DISCLOSURES	
LAW OFFICE OF G. P.O. Box 504970, 2 nd F San Jose, Saipa Tel. No. (670) 235-4802	15	DONG GUK CORPOR	ATION)	DISCLOSURES	
	16	Dof	endant) Data Oat 28	2005	
	17	Der	endant) Date Oct. 28,) time: 8:30 a.r		
P P Tel. N	18			· · · · · · · · · · · · · · · · · · ·		
	19	Comes now defendant Dong Guk Corporation ("DGC") which submits th				
	20	following pre-discovery disclosure:				
	21	Tonowing pre discovery disclosure.				
	22	A. PERSONS WITH DISCOVERABLE INFORMATION:				
	23	The persons known to DGC who possess discoverable knowledge include				
	24	but are not limited, to the following:				
	25	out are not infinited, to the following.				
	26	1. Gyu Jin Kim				
	27	Page 1 of 4				
	28					

San Jose, Saipan, MP 96950	35-4802 Fax No: (670) 235-4801	
an Jose, Saipai) 235-4802	
Ś	1. No. (670	

2.	Lee Jung Soon
3.	Park Jin Joo
4.	Lee, Sung Chun
5.	Lee, Mi Yeon

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- Moon, Young Soo 6.
- Oh, Ok Soon 7.

DESCRIPTION AND LOCATION OF RELEVANT DOCUMENTS: B.

The documents possessed by DGC relevant to his defenses in this lawsuit are as follows:

- DCG's ABC license 1.
- The business receipts for the evening of August 1, 2004 and early morning of August 2, 2004.

Other documents not possessed by DGC which are believed to be relevant to the lawsuit include but are not limited to the following:

- The police investigation report of the traffic accident on or about August 2, 1. 2004. This document is believed to be in the possession of the Commonwealth Department of Public Safety
- The traffic case and /or criminal case, if any, against Gyu Jin Kim. 2.
 - Documentation regarding this matter will possessed by the Superior Court

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LAW OFFICE OF G. ANTHONY LONG P.O. Box 504970, 2nd Floor Lim's Building

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of the Northern Mariana Islands.

- 3. The medical records, if any, reflecting the treatment received by Gyu Jin Kim following the traffic accident. Such documentation, if it exists, should be in the possession of the Commonwealth Health Center.
- The autopsy of Jung Soon Lee, if any. This document, if it exists, should 3. be in the possession of the Commonwealth Health Center.
- The judicial proceedings in which Sung Young Lee was appointed the 4. personal representative of Jung Soon Lee. This documentation, if it exists, should be in the possession of the Superior Court of the Northern Mariana Islands.

C. **EXPERT WITNESSES:**

DGC has not made a determination as to whether it will use an expert witness in this case.

COMPUTATION OF DAMAGES: D

DGC does not have a claim for damages.

LAW OFFICE OF G. ANTHONY LONG P.O. Box 504970, 2nd Floor Lim's Building San Jose, Saipan, MP 96950

E. INSURANCE

DCG possesses business liability insurance issued by Dongbu Insurance Co. Ltd.

Dated this 27th day of October, 2005.

Law Office of G. Anthony Long

G. Anthony Long